



To: Platform Committee  
CC: Bud Krogh  
From: Robert Kahn, NIPPC  
Re: Proposal Refinement  
Date: December 1, 2003

On behalf of the Northwest Independent Power Producers Coalition (NIPPC) please accept our thanks for your superb work. The unanimous agreement that was reached at the last RRG meeting could not have occurred without your efforts.

NIPPC is disappointed that many elements of the "Platform" didn't go further toward resolving some of the major problems identified in this phase of the RRG process. We offer the following partial list of items we would like to see included in a final RTO West proposal. We would insist that some or all these items be included as "planks in the platform" in the event that you find it necessary to make substantive revisions to the consensus document in order to placate other interests. However, in the spirit of reaching a regional consensus, we will not insist that these items be included if the consensus proposal essentially remains intact.

We believe that a robust RTO would include:

- Faster and clearer transition to a financial rights model without a trustee selection committee vote
- Termination of company rates after a much shorter period than 8 years
- A vote of six instead of seven by the Board on key issues to override a trustee selection committee vote
- Clear definition, a clear path and a quicker transition to the end state
- Fewer items on the Board list for Trustee selection Committee votes

We believe that there are refinements to the proposal that are consistent with it that would improve it and would recommend the Platform committee include in its work this week.

- A clear definition of the beginning state
- Certainty that we will not get stuck in a physical rights model that was studied and rejected as infeasible during the Stage 2 process
- Precise delineation of the trustee selection committee voting items—NIPPC would not like to see a Board fight over whether or not a certain change qualified as a voting item. Once again these changes should be restricted to only those relating to a major change in scope as proposed in the Platform document.

Committee members – again, you have done an extraordinary job. NIPPC will be looking out for refinements to your initial efforts and watching out for wholesale revisions. It is our position that should you pursue the latter course of wholesale revisions, you would also need to address the short list of key issues listed above in your deliberations. Please understand, however, that NIPPC will continue to support the consensus proposal (with consistent refinements) as you originally brought it to the full RRG on November 19<sup>th</sup>.

Thank you and see you on December 10<sup>th</sup>.